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Commissioner of Social Security  
P.O. Box 17703  
Baltimore, MD 21235-7703

Dear Commissioner:

RE: Notice of Proposed Rulemaking on Revised Medical Criteria for Evaluating Impairments That Affect Multiple Body Systems.

NADE has reviewed the NPRM on the revised medical criteria for evaluating impairments that affect multiple body systems. We are in fundamental agreement with the changes proposed. We agree that simplifying the heading for Listings 10.06 and 110.06 is helpful in clarifying that only non-mosaic Down syndrome is evaluated under these Listings. We also agree with the content and wording of proposed Listing 110.08

We are not convinced that Listing 110.07 should be eliminated. Although this is basically a reference Listing it serves to reinforce the need to assess multiple body dysfunction regardless of the underlying condition. At a time when an increasing number of Disability Examiners have less than two years experience we believe that this Listing, which serves as a valuable reminder of this basic concept, should be retained.

We appreciate your attention to our comments. Please feel free to contact me if you have questions.

Sincerely,

Theresa B. Klubertanz  
Acting President

cc: Sue Roecker, Associate Commissioner for Disability Programs  
Lenore Carlson, Associate Commissioner for Disability Determinations  
NADE Board of Directors